

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

HARRISON COMPANY LLC,

Plaintiff,

v.

**A-Z WHOLESALERS INC. and
BARKAT G. ALI,**

Defendants.

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CIVIL ACTION NO. 3:19-CV-1057-B

PLAINTIFF'S DESIGNATION OF ATTORNEYS' FEE EXPERTS

Plaintiff, Harrison Company, LLC, may use the following witnesses to present evidence under Federal Rules of Evidence 702, 703, or 705 and/or in support of a post-judgment motion under Federal Rule of Civil Procedure 54(d):

1. David L. Swanson
Locke Lord LLP
2200 Ross Avenue, Suite 2800
Dallas, Texas 75201
T: (214) 740-8000
2. Joseph A. Unis, Jr.
Locke Lord LLP
2200 Ross Avenue, Suite 2800
Dallas, Texas 75201
T: (214) 740-8000

Mr. Swanson and/or Mr. Unis will opine on the reasonableness and necessity of the attorneys' fees and expenses incurred by Plaintiffs in connection with this litigation. Mr. Swanson and Mr. Unis will base their opinions on their education, training, and experience as lawyers; their work on this case; and, their review of the time and expense records of Plaintiff's attorneys, in consideration of the following factors: (a) the time and labor required; (b) the skill required to

perform the services properly; (c) the likelihood that representing the client would preclude other employment; (d) the amount involved and the results obtained; (e) the experience, reputation and ability of the attorneys; (f) the type of fee arrangement involved; (g) awards in similar cases; and, (h) experience in handling the same or similar cases. The precise nature of Mr. Swanson and Mr. Unis's opinions is not yet known because the case is still ongoing and because all of the documents and testimony Mr. Swanson and Mr. Unis need to formulate their opinions have not been provided to date. Mr. Swanson and/or Mr. Unis may also opine on the reasonableness and necessity of any request for attorneys' fees made by the Defendants, based on the same or similar information and factors listed above.

By designating Mr. Swanson and Mr. Unis as witnesses on attorneys' fees, Plaintiff is not waiving its right to designate additional expert witnesses on issues on which they do not bear the burden of proof. *See* Scheduling Order, ECF No. 9.

Respectfully submitted,

/s/ David L. Swanson

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**ATTORNEYS FOR PLAINTIFF
HARRISON COMPANY, L.L.C.**

CERTIFICATE OF SERVICE

I certify that on November 21, 2019, I served this document on all counsel of record via the ECF system and/or email.

/s/ Anna K. Finger